

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HALO CREATIVE & DESIGN LIMITED, a Hong Kong company, HALO TRADEMARKS LIMITED, a Hong Kong company and HALO AMERICAS LIMITED, a Hong Kong company,

*Plaintiffs and Counter-Defendants*

v.

COMPTOIR DES INDES INC., a Quebec corporation, CDI INTERNATIONAL, and CDI FURNITURE,

*Defendants and One Counter-Plaintiff.*

Civil Action No. 1:14-cv-08196

Judge Harry D. Leinenweber

Magistrate Judge Susan E. Cox

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**PLAINTIFF’S MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL**

Plaintiffs Halo Creative & Design Limited, Halo Trademarks Limited and Halo Americas Limited (collectively, “Halo”), respectfully move this Court to file under seal two exhibits to Halo’s Motion for Entry of Permanent Injunction and Award of Prejudgment Interest.

Local Rule 26.2 provides that the Court may determine that a particular document or exhibit merits restricted status before any party may file such materials under seal. *See* LR 26.2. The Court restricts access to a document only for “good cause shown.” *See* LR 26(b).

In support of its Motion for Leave to File Under seal, Halo states as follows:

1) Exhibits C and D to Halo’s Motion for Entry of Permanent Injunction and Award of Prejudgment Interest each contain Defendants’ revenue information that was designated by Defendants as being either HIGHLY CONFIDENTIAL or CONFIDENTIAL under the terms of

the Protective Order entered by this Court on August 22, 2016 (‘Protective Order’).<sup>1</sup> (Dkt. No. 83.)

2) Halo submits Exhibit C in support of its motion to show the timing of Defendants’ infringing sales, relative to the requested award of prejudgment interest. Halo submits Exhibit D in support of its motion to show the calculations in support of Halo’s requested award of prejudgment interest. Because these two Exhibits contain information that has been designated HIGHLY CONFIDENTIAL, they cannot be filed publicly with the Court.

3) Pursuant to Local Rule 26.2, Halo has provisionally filed under seal Exhibits C and D to Halo’s Motion for Entry of Permanent Injunction and Award of Prejudgment Interest.

WHEREFORE, Halo respectfully requests that the Court grant its Motion for Leave to File Under Seal, in order to permit Halo to file under seal Exhibits C and D to Halo’s Motion for Entry of Permanent Injunction and Award of Prejudgment Interest.

Respectfully Submitted,

Dated: February 2, 2018

/s/ Barry R. Horwitz

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<sup>1</sup> The Protective Order provides, in part: “Highly Confidential Information” means information, the disclosure of which....would place the party in a competitive disadvantage to the receiving party...that falls within one of the following categories: (a) information that reveals future business plans; (b) financial information not yet publicly available; (c) information that reveals trade secrets; or (d) research, technical, commercial, or financial information that the party has maintained as confidential or highly confidential. (Dkt. No. 84.) The Protective Order further provides, in part: “Confidential Information” means information, that calls into one or more of the following categories: (a) information prohibited from disclosure by statute; (b) medical information concerning any individual; (c) personal identity information; (d) income tax returns (including attached schedules and forms, W-2 forms and 1099 forms; or (e) personnel or employment records of a person who is not a party to the case. (Dkt. No. 84.)

*Attorneys for Halo Creative & Design  
Limited, Halo Trademarks Limited and Halo  
America's Limited*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that all counsel of record who are deemed have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on February 22, 2018.

/s/ Barry R. Horwitz  
Barry R. Horwitz